

**ORIGINAL****SUMMIT DEFENSE**

**A Professional Law Corporation**  
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**Attorneys for Defendant HYUNG LIM**


**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA,****Plaintiff,****vs.****HYUNG G. LIM,****Defendant.**: **Case No. 12 Cr. 121**: **~~(PROPOSED)~~ ORDER**: **GRANTING MOTION**: **PURSUANT TO LOCAL**: **RULE 1.3(c) TO**: **APPEAR ON BEHALF OF**: **DEFENDANT HYUNG G. LIM**: **and DECLARATION IN**: **SUPPORT THEREOF**

The Motion by James T. Reilly, Attorney at Law, pursuant to Local Rule 1.3(c), requesting permission to appear in this Court on behalf of Defendant Hyung G. Lim, having been considered by the Court, and good cause appearing therefor, IT IS HEREBY ORDERED that the motion is granted.

IT IS SO ORDERED.

Date: 9/4/12

  
 The HONORABLE Richard J. Sullivan  
 Judge, United States District Court  
 Southern District of New York

**ORIGINAL****SUMMIT DEFENSE****A Professional Law Corporation****JAMES T. REILLY, Attorney at Law****California State Bar No. 67254****4040 Civic Center Drive, Suite 200****San Rafael, CA 94903****Phone: 510-412-8900****Cell: 415-913-0787****Fax: 415-689-5213****email: jim@summitdefense.com****Attorneys for Defendant HYUNG LIM****UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK****UNITED STATES OF AMERICA,****Plaintiff,****vs.****HYUNG G. LIM,****Defendant.****: Case No. S3 Cr. 121 (RJS)****:  
: MOTION PURSUANT TO  
: LOCAL RULE 1.3(c) TO  
: APPEAR ON BEHALF OF  
: DEFENDANT HYUNG G. LIM  
: and DECLARATION IN  
: SUPPORT THEREOF  
:**

NOTICE IS HEREBY GIVEN THAT JAMES T. REILLY, ATTORNEY AT LAW,  
WILL AND HEREBY DOES MOVE, PURSUANT TO LOCAL RULE 1.3(c), FOR  
PERMISSION TO APPEAR ON BEHALF OF THE DEFENDANT IN THIS CASE, HYUNG  
G. LIM, FOR THE PURPOSE OF REPRESENTING HIM WITH RESPECT TO ALL  
PROCEEDINGS IN THIS MATTER. THIS MOTION IS BASED ON THE ATTACHED  
DECLARATION OF COUNSEL IN SUPPORT THEREOF.

August 29, 2012



**JAMES T. REILLY, Attorney at Law  
California State Bar No. 67254  
Counsel for Defendant HYUNG G. LIM**

**MOTION PURSUANT TO LOCAL RULE 1.3(c)**

James T. Reilly, Attorney at Law, of Summit Defense, A Professional Law Corporation, hereby moves, pursuant to Rule 1.3(c) of the Joint Local Civil Rules for the United States District Courts for the Southern and Eastern Districts of New York, for permission to appear on behalf of the defendant in this case, Hyung G. Lim, for the purpose of representing him with respect to all proceedings in this matter.

Local Rule 1.3(c) provides:

A member in good standing of the bar of any state or of any United States District Court may be permitted to argue or try a particular case in whole or in part as counsel or advocate, upon motion (which may be made by the applicant) and upon filing with the Clerk of the District Court a certificate of the court for each of the states in which the applicant is a member of the bar, which has been issued within thirty (30) days of filing and states that the applicant is a member in good standing of the bar of that state court. Only an attorney who has been so admitted or who is a member of the bar of this court may enter appearances for parties, sign stipulations or receive payments upon judgments, decrees or orders.

The Committee Note to this rule states that the reason such a motion may be brought directly by the applicant, and need not be made by a member of the Court's bar, is that "this is a logical corollary of the fact that the Southern and Eastern Districts no longer require that attorneys admitted pro hac vice be associated with local counsel who are members of the Court's bar."

1 This motion is based on the attached Declaration of James T.  
2 Reilly, with attached Exhibit A, Certificate of Standing, issued by  
3 The State Bar of California on August 24, 2012, which together  
4 provide grounds for the granting of the motion.

5  
6 August 29, 2012

A handwritten signature in black ink, appearing to read 'J. Reilly', written over a horizontal line.

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8 **JAMES T. REILLY, Attorney at Law**  
9 **California State Bar No. 67254**  
10 **Counsel for Defendant HYUNG G. LIM**  
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**DECLARATION IN SUPPORT OF MOTION  
PURSUANT TO LOCAL RULE 1.3(c)**

I, James T. Reilly, hereby declare, under penalty of perjury under the laws of the State of California and of the United States of America, that I am an attorney, duly licensed to practice law in the State of California and that:

I was admitted by the Supreme Court of the State of California to practice law in that state on December 18, 1975, and have since been continuously and remain at this time an active member of the State Bar of California, duly licensed and authorized to practice law in that state. I have not at any time been the subject of any recommendation to the Supreme Court of the State of California for discipline for professional or other misconduct by the Board of Trustees or a Disciplinary Board. Attached hereto as Exhibit A to this declaration, and in accordance with Local Rule 1.3(c), is a "Certificate of Standing" issued by The State Bar of California on August 24, 2012, certifying the accuracy of the foregoing information.

I am also admitted to practice before the United States District Courts of Northern and Eastern California and am actively representing clients in the Northern District of California, both San Francisco and San Jose Divisions, and the Eastern District. My active or recently concluded federal court cases include several major fraud cases including:

Northern District of California, San Francisco Division: U.S. v. Roberto Heckscher, Case No. CR 09-0998SI (mail fraud/Ponzi scheme), U.S. v. Crisnan Mapote, Case No. CR 09-726-MMC

(mail/mortgage fraud) and U.S. v. Fahim Choudhary, Case No. CR-10-0611WHA (mail/mortgage fraud).

Northern District of California, San Jose Division: U.S. v. Robert E. Estupinian, Case No. CR-09-01212-DLJ (1031 exchange wire fraud).

Eastern District of California: U.S. v. Deborah Loudermilk, Case No. 2:11-CR-0458GEB (mail/mortgage fraud).

Summit Defense and I have been retained by the defendant in this matter, Hyung G. Lim, and it is his desire that I represent him in the proceedings to be conducted before this court.

Executed this 29th day of August, 2012, at Novato, California.

A handwritten signature in black ink, appearing to read "J. Reilly", written over a horizontal line.

**JAMES T. REILLY, Attorney at Law  
California State Bar No. 67254  
Counsel for Defendant HYUNG G. LIM**

**Summit Lim Motion Pursuant to Local Rule 1.3(c) 120829**

**Exhibit A**





## THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

### CERTIFICATE OF STANDING

August 24, 2012

#### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JAMES THOMAS REILLY, #067254 was admitted to the practice of law in this state by the Supreme Court of California on December 18, 1975; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner  
Custodian of Membership Records



Re: The United States of America v. Hyung G. Lim  
US District Court, Southern District of New York

**PROOF OF SERVICE**

I, **JAMES T. REILLY**, hereby certify that I am an active member of  
the State Bar of California and not a party to this action.

My business address is:

JAMES T. REILLY, Attorney at Law  
SUMMIT DEFENSE  
4040 Civic Center Drive, Suite 200  
San Rafael, CA 94903

I served copies of the indicated document as follows:

Date of Delivery: August 29, 2012

Delivered by email addressed to:

Assistant US Attorney Antonia Apps  
United States Attorney's Office  
At her email address: antonia.apps@usdoj.gov

Document Delivered:

**MOTION PURSUANT TO LOCAL RULE 1.3(c) TO APPEAR  
ON BEHALF OF DEFENDANT HYUNG G. LIM and  
DECLARATION IN SUPPORT THEREOF**

I declare under penalty of perjury that the foregoing is true  
and correct and that this declaration is executed on August 29, 2012,  
at Novato, California.

A handwritten signature in black ink, appearing to read 'J. Reilly', is written over a horizontal line.

**JAMES T. REILLY, Attorney at Law  
California State Bar No. 67254  
Counsel for Defendant Hyung G. Lim**